

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)
v.)
Plaintiffs,)
GOOGLE LLC,)
Defendant.)
No. 1:23-cv-00108-LMB-JFA

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Modified Protective Order (Dkt. 203), Plaintiffs respectfully move this Court to seal Exhibits 4–6 and portions of Exhibits 1–3 to Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion to Compel Google’s Internal Analyses of Remedy Feasibility, as well as the portions of the Memorandum of Law that reference sealed portions of the exhibits. The documents or portions of documents that Plaintiffs seek to seal contain material Defendant Google has designated as confidential or highly confidential. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the accompanying memorandum of law. A proposed order is attached for the Court’s convenience.

Dated: May 23, 2025

Respectfully submitted,

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